

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>MARCOS ANTONIO ORTIZ-CORA,</b>	<b>:</b>	<b>VIOLATION: 21 U.S.C. § 846</b>
<b>JUAN MANUEL MENDEZ-LAZARO</b>		<b>(conspiracy to possess</b>
<b>BERNARDO BANUELOS, JR.,</b>	<b>:</b>	<b>with intent to distribute</b>
<b>JUAN CARLOS VALERIO,</b>		<b>cocaine - 1 count)</b>
<b>ANDRES ELIAS TAVERAS</b>	<b>:</b>	<b>21 U.S.C. § 853</b>
		<b>(Notice of forfeiture)</b>

**INDICTMENT**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

From on or about May 20, 2004, to on or about May 21, 2004, in Reading, in the Eastern District of Pennsylvania and elsewhere, defendants

**MARCOS ANTONIO ORTIZ-CORA,**  
**JUAN MANUEL MENDEZ-LAZARO,**  
**BERNARDO BANUELOS, JR.,**  
**JUAN CARLOS VALERIO, and**  
**ANDRES ELIAS TAVERAS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute over five kilograms, that is, approximately 12.9 kilograms (12,980 grams), of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

1. Defendant BERNARDO BANUELOS, JR. agreed to transport approximately 13 kilograms of cocaine from Colorado to the Day's Inn, on Route 222, in Reading, Pennsylvania, and deliver the cocaine to the other defendants at that location.
2. Defendants JUAN MANUEL MENDEZ-LAZARO and defendant MARCOS ANTONIO ORTIZ-CORA paid BERNARDO BANUELOS, JR. for transporting the cocaine.
3. Defendants JUAN CARLOS VALERIO and ANDRES ELIAS TAVERAS met defendant BERNARDO BANUELOS, JR. at the Day's Inn in order to take delivery of the cocaine.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were performed by the defendants in the Eastern District of Pennsylvania, and elsewhere:

1. On or about May 20, 2004, defendant BERNARDO BANUELOS, JR. drove from Colorado to Ohio in a 1999 red Chrysler which contained approximately 12.9 kilograms of cocaine.
2. On or about May 21, 2004, defendants JUAN CARLOS VALERIO and ANDRES ELIAS TAVERAS met with BERNARDO BANUELOS, JR. in the parking lot of the Day's Inn, on Route 222, in Reading, Pennsylvania.

3. On or about May 21, 2004, defendant JUAN MANUEL MENDEZ-LAZARO called the cellular telephone of ANDRES ELIAS TAVERAS in order to determine the status of the cocaine delivery.

4. On or about May 21, 2004, defendant JUAN MANUEL MENDEZ-LAZARO instructed BERNARDO BANUELOS, JR. to meet him at a K-Mart Store near the Day's Inn.

5. On or about May 21, 2004, defendants JUAN MANUEL MENDEZ-LAZARO and MARCOS ANTONIO ORTIZ-CORA went to the parking lot of the K-Mart in Reading for the purpose of receiving the approximately 12.9 kilograms of cocaine.

All in violation of Title 21, United States Code, Section 846.

**NOTICE OF FORFEITURE**

As a result of the violation of Title 21, United States Code, Section 846 as set forth in Count One of this indictment, defendants

**MARCOS ANTONIO ORTIZ-CORA,  
JUAN MANUEL MENDEZ-LAZARO,  
BERNARDO BANUELOS, JR.,  
JUAN CARLOS VALERIO, and  
ANDRES ELIAS TAVERAS**

shall forfeit to the United States of America, the following property:

- A. All property derived from any proceeds which defendants obtained directly or indirectly, as a result of the violation of Title 21 as charged in this indictment; and
- B. All property owned by the defendants which was used or intended to be used in any manner or part to commit or facilitate the commission of the violation of Title 21 as charged in the indictment, including but not limited to one red 1999 Chrysler 300M, VIN # 2C3HE66G1XH509617, bearing Colorado license plate 225JTA.

Pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**